

Kent Ries, Attorney at Law  
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COUNSEL FOR TRUSTEE

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

<b>IN RE:</b>	§	
	§	
<b>MICHAEL STEPHEN GALMOR,</b>	§	<b>CASE NO. 18-20209-RLJ-7</b>
	§	
<b>Debtor.</b>	§	
	§	
<b>And</b>	§	
	§	
<b>GALMOR’S/G&amp;G STEAM SERVICE,</b>	§	<b>CASE NO. 18-20210-RLJ-7</b>
<b>INC.,</b>	§	
	§	
<b>Debtor.</b>	§	
<hr style="border: 1px solid black;"/>		
<b>KENT RIES, TRUSTEE,</b>	§	
	§	
<b>Plaintiff,</b>	§	
	§	
<b>v.</b>	§	<b>ADVERSARY NO. 20-2003</b>
	§	
<b>GALMOR FAMILY LIMITED</b>	§	
<b>PARTNERSHIP and GALMOR</b>	§	
<b>MANAGEMENT, L.L.C.,</b>	§	
	§	
<b>Defendants.</b>	§	

**OBJECTION OF TRUSTEE TO LESLIE PRITCHARD’S CROSS-MOTION FOR  
PARTIAL SUMMARY JUDGEMENT**

TO THE HONORABLE ROBERT L. JONES, BANKRUPTCY JUDGE:

COMES NOW PLAINTIFF, KENT RIES, Trustee in these two bankruptcy cases (“Trustee”), and files his *Objection* (the “Objection”) to *Leslie Pritchard’s Cross-Motion for Partial Summary Judgement* (the “Motion”), filed by Leslie Pritchard (“Pritchard”), court-appointed

liquidator for Galmor Family Limited Partnership (the “GFLP”), a defendant in the above styled and numbered Adversary Proceeding, respectfully stating as follows:

The Trustee has previously agreed with Pritchard’s counsel that the Trustee’s claims for “money had and received” and “unjust enrichment” are governed by a two year statute of limitations. Based on Pritchard’s counsel’s representations on January 2, 2022, he agreed to withdraw his Motion upon such agreement. Pritchard’s counsel also agreed to stipulate that his statute of limitations defense on two specific invoices in the Trustee’s breach of contract claim would be withdrawn with prejudice.

The Trustee is ready and willing to stipulate to the agreement of the parties described above.

The Trustee objects to all other relief requested in the Motion.

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By: /s/ Kent Ries  
Kent Ries  
State Bar No. 16914050  
ATTORNEY FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I hereby certify that on the 14<sup>th</sup> day of January, 2022, a true and correct copy of the above and foregoing Motion was sent electronically via ECF to the party listed below:

Davor Rukavina  
Munsch, Hardt, Kopf & Harr  
500 N. Akard Street, Suite 3800  
Dallas, Texas 75201-6659

/s/ Kent Ries  
Kent Ries